

**FILED**

9/26/2016

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

Sean Hanks M48627

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

vs.

Thomas J. Dart

Director Daniel Moreci

Director Jones

Officer John Doe

Sergeant Jones

(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")

**CHECK ONE ONLY:**



COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983  
U.S. Code (state, county, or municipal defendants)

COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE  
28 SECTION 1331 U.S. Code (federal defendants)

OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR  
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

RECEIVED

AUG 29 2016

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

Case No: 16 C 6890  
(To be supplied by the Clerk of this Court)

Amended Complaint

## I. Plaintiff(s):

- A. Name: Sean Hanks
- B. List all aliases: NONE
- C. Prisoner identification number: M48627
- D. Place of present confinement: Pontiac C.C.
- E. Address: P.O. Box 99 Pontiac IL, 61764

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, and current address according to the above format on a separate sheet of paper.)

## II. Defendant(s):

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: Thomas Dart  
 Title: Sheriff  
 Place of Employment: Cook County Jail
- B. Defendant: Director Daniel Moreci  
 Title: Director of 9 / Sheriff  
 Place of Employment: Cook County Jail
- C. Defendant: Director Jones  
 Title: Director of Cook County Mental Health  
 Place of Employment: Cook County Correctional

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

D. Sergeant Jones  
 Title: Cook County Sergeant

E. Officer John Doe

Title: Sheriff

Place of Employment: Cook County Jail

Place of Employment: Cook County Jail

## IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

Director Jones, Ofc. John Doe, Sgt. Jones that plaintiff would suffer physical and mental injury on that day due to their indifference to his mental illness. Do to the indifference and omissions with knowledge by defendants ~~that plaintiff~~ plaintiff suffered physical injuries and emotional distress proximately caused by violations of his constitutional rights.

Court II Jurisdiction of this court is invoked Pursuant 28 USC 136 (c). At all times relevant Thomas Dart served as Sheriff of Cook County a duly elected official. At All times relevant Defendants Ofc. John Doe Sgt. Jones, Dir. Moreci, Dir. Jones acted within the scope of their employment as deputy sheriffs of Cook County. Illinois Pursuant to 745 ILCS. 10/a - 102, Defendants Thomas Dart in his official capacity as Sheriff of Cook County is required to indemnify the above named defendants for any compensatory damages awarded by Judgement of this Court.

Defendants Thomas Dart is sued in his individual and official capacity Director Jones, Moreci, Officer John Doe Sgt. Jones, Nurse Jane Doe are sued in there individual and official capacity All personally involved one way or another through personal involvement or knowledge.

# V. Statement of Claim:

State here as briefly as possible the facts of your case. Describe precisely how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

This lawsuit complaint for damages to redress acts violating  
plaintiff's constitutional right to be provided medical treatment and  
negligence while incarcerated in violation of the Constitutional rights under  
42 USCA Due Process / Equal Protection. Defendants Director Daniel  
Moreci and Director Jones together gave clearance for me to  
be transferred to Div 9 Administrative Cell block where in past  
I have jumped from Div 9 Gallery therefore being deliberate  
Indifferent to serious medical need.

On I believe 10.31.14 of the 7-3 shift tier 141 Div 9  
reported to John Doe Defendant that he was in need of  
Mental Evaluation while inside interlock area being medicated  
in presence of nurse also. I further stated that I have a  
history of Mental Health and self harm. Officer John Doe  
order me to return to tier in a loud voice.

After returning to Cellblock I ingested pills and  
climbed stairs of gallery proceeded through railing  
falling to ground with serious impact unconscious.

Sgt. Jones and other Nurse ~~came~~ came to  
me while I was on floor I was awoken after

Nurse grab and applied pressure to neck and back causing me great pain attempting to get me to stand.

I was left for over a hour while in pain unable to move. During that time I was able to throw up the pills inside my stomach.

Paramedics were called and I was placed on backboard by firefighters and taken to Stroger Hospital.

At all times above mentioned Director Daniel Moreci was Director of Div 9 in Cook County Jail and was responsible for care and Medical needs of inmates.

At all times mentioned Director Jones was responsible for Mental Health inmates overseeing treatment adequate housing ect.

The actions of Defendants Dir Daniel Moreci, Dir Jones Sgt. Jones, Ofc. John Doe in denying treatment to plaintiff while having knowledge of the fact that he was in jeopardy of injury without medical treatment constitutes deliberate indifference to his condition resulting in cruel and unusual Punishment Suffering by plaintiff while he was awaiting trial and prior to adjudication of Guilt constitutes a violation of U.S. Constitution. It was foreseeable to defendants Dir. Moreci

VI. Relief:



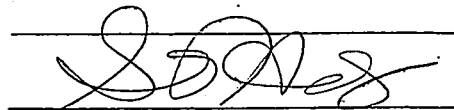
State briefly exactly what you want the court to do for you. Make no legal arguments.  
Cite no cases or statutes.

Plaintiff prays for entry of a Judgment  
against defendants and award of  
compensatory as well as Penitine damages  
cost and attorney fees.

Trial by Jury ☒ yes ☐ no CERTIFICATION

By signing this Complaint, I certify that the facts stated in this  
Complaint are true to the best of my knowledge, information and  
belief. I understand that if this certification is not correct, I may be  
subject to sanctions by the Court.

Signed this 22 day of Aug, 2016.



(Signature of plaintiff or plaintiffs)

Sean Hanks

(Print name)

148627

(I.D. Number)

Pontiac Correction Center

Pobox 99

Pontiac, IL 61764

(Address)

IN THE

United States District Court

Sean Hanks

Plaintiff/Petitioner

Vs.

Thomas Dort

Defendant/Respondent

No. 16 C 6890

PROOF/CERTIFICATE OF SERVICE

TO: Prisoners Correspondent  
219 S. Dearborn St.  
Chicago IL 60604

Assistant States Attorney  
TO: 500. Richard J. Daley Center  
Chicago IL 60602

PLEASE TAKE NOTICE that at: 10 AM PM 25 Aug, 2016,  
placed the documents listed below in the institutional mail at Pontiac, IL  
Correctional Center, properly addressed to the parties listed above for mailing through the  
United States Postal Service.

Pursuant to 28 USC 1746, 18 USC 1621 or 735 ILCS 5/1-109 I declare, under penalty of perjury  
that I am a named party in the above action, that I have read the above documents, and that  
the information contained therein is true and correct to the best of my knowledge and belief.

DATED: 25 Aug 2016

/s/ [Signature]  
Name: Sean Hanks  
IDOC No. 148627  
Pontiac Correctional Ctr.  
POB 99  
Pontiac, IL